

LAW OFFICES  
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ROBERT ORMAN  
CHRISTIAN J. GABROY \*

\* Also admitted in Nevada

JOSEPH B. DENENBERG  
(OF COUNSEL)

January 8, 2008

**BY CERTIFIED MAIL**

**RRR-7003-0500-0002-2502-4950**

**AND BY EMAIL:** [Brenda.Viteri@ci.irs.gov](mailto:Brenda.Viteri@ci.irs.gov)

Internal Revenue Service

Special Agent in Charge

**Attn: Asset Forfeiture Coordinator, Brenda Viteri**

230 South Dearborn Street - Suite 1400

Chicago, Illinois 60604

Re: Supreme Juice Company

Dear Coordinator Viteri:

Enclosed please find the following with respect to the seizure of \$139,506.14 from the above company.

1. Supreme Juice Company's claim form; and
2. Supreme Juice Company's request for immediate release of seized property.

If you have any questions, do not hesitate to contact me.

Very truly yours,



Robert Orman

RO/nit  
Enc.



**SEIZED ASSET CLAIM FORM**

Name: Supreme Juice Co.  
Address: 1307 South Pulaski, Chicago IL 60623  
Telephone Number: 773-277-5800  
Date of Seizure: On or about 11/28/07  
Seizure Location: Park National Bank, 11 W. Madison St., Oak Park, Illinois 60302.

**PART I**

List all the items in which you claim an interest. Include sufficient information to identify the items, such as serial numbers, make and model numbers, tail numbers, photographs, and so forth. Attach additional sheets of paper if more space is needed.

**Funds in claimant's bank account, number 1865593, held at Park National Bank (address above). Totaling \$139,506.14.**

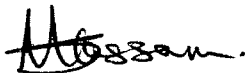
**PART II**

State your interest in each item of property listed above. Provide any documents that support your claim of interest, such as titles, registrations, bills of sale, receipts, and so forth. Attach additional sheets of paper if more space is needed.

**Claimant is the owner of the above bank account and the funds therein (recent bank statement hereto attached).**

**PART III (ATTESTATION AND OATH)**

I attest and declare *under penalty of perjury* that my claim to this property is not frivolous and that the information provided in support of my claim is true and correct to the best of my knowledge and belief.



Shabir Kassam as an officer and  
Director of Supreme Juice Co.



Date



PARK NATIONAL

## Statement of Account

Last statement: October 31, 2007

This statement: November 30, 2007

Total days in statement period: 30

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Direct inquiries to:  
 24 Hour Access 866 Parknatl  
 OR WWW.PARKNATL.COM

SUPREME JUICE CO  
 1307 S PULASKI RD  
 CHICAGO IL 60623-1236

Park National Bank  
 11 West Madison  
 Oak Park, IL 60302

57

## Summary of Account Balance

Account	Number	Ending Balance
Business Checking	0001865593	\$-1,103.45

## Business Checking

Account number 0001865593 Low balance \$-15,408.00

## 57 Enclosures

Date	Description	Additions	Subtractions	Balance
10-31	Beginning balance			\$115,621.48
11-01	#Deposit 00000350126614	11,124.65		126,746.13
11-01	Check 8716 00000310144119		-3,666.19	123,079.94
11-02	#Deposit 00000350142507	22,854.79		145,934.73
11-02	Check 8714 00000310235707		-36,942.96	108,991.77
11-05	#Deposit 00000330410627	17,998.88		126,990.65
11-05	SC Check 8717 00000310412636		-730.97	126,259.68
11-05	Check 8715 00000310409302		-590.51	125,669.17
11-05	Check 8718 00000310411355		-443.67	125,225.50
11-06	#Deposit 00000330422681	13,383.30		138,608.80
11-06	#Return Deposit Item 126001106160541		-562.50	138,046.30
11-06	#Service Charge RETURN DEPOSIT ITE 126001106160541		-7.00	138,039.30

November 30, 2007  
0001865593 Page 2 of 8SUPREME JUICE CO  
1307 S PULASKI RD  
CHICAGO IL 60623-1236Direct inquiries to:  
24 Hour Access 866 Parknatl  
OR WWW.PARKNATL.COMPark National Bank  
11 West Madison  
Oak Park, IL 60302

<i>Date</i>	<i>Description</i>	<i>Additions</i>	<i>Subtractions</i>	<i>Balance</i>
11-06	#Return Deposit Item 126001106160541		-383.58	137,655.72
11-06	#Service Charge RETURN DEPOSIT ITE 126001106160541		-7.00	137,648.72
11-07	#Deposit 00000340376382	14,525.47		152,174.19
11-07	Deposit Adj Debit 00000340376383		-638.59	151,535.60
11-07	#Preauthorized Debit CERTIFIED GROC STR STATEM 071107 21000025824932		-4,568.80	146,966.80
11-08	#Return Deposit Item 03001108145243		-579.25	146,387.55
11-08	#Service Charge RETURN DEPOSIT ITE 03001108145243		-7.00	146,380.55
11-08	#Return Deposit Item 03001108145335		-467.12	145,913.43
11-08	#Service Charge RETURN DEPOSIT ITE 03001108145335		-7.00	145,906.43
11-08	Check 8719 00000310046891		-11,756.93	134,149.50
11-09	#Deposit 00000340389847	18,452.27		152,601.77
11-09	#Return Deposit Item 130001109160504		-464.87	152,136.90
11-09	#Service Charge RETURN DEPOSIT ITE 130001109160504		-7.00	152,129.90
11-09	#Return Deposit Item 130001109161001		-100.00	152,029.90
11-09	#Service Charge RETURN DEPOSIT ITE 130001109161001		-7.00	152,022.90
11-09	Check 8720 00000310152742		-28,090.62	123,932.28
11-13	#Deposit 00000340415692	14,762.19		138,694.47
11-13	#Deposit 00000340415671	12,121.42		150,815.89
11-13	Check 00000340415690		-547.64	150,268.25
11-13	Check 00000340415685		-545.33	149,722.92
11-13	Check 00000340415686		-545.33	149,177.59



PARK NATIONAL

BANK

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1307 S PULASKI RD  
CHICAGO IL 60623-1236Direct inquiries to:  
24 Hour Access 866 Parknatl  
OR WWW.PARKNATL.COMPark National Bank  
11 West Madison  
Oak Park, IL 60302

<i>Date</i>	<i>Description</i>	<i>Additions</i>	<i>Subtractions</i>	<i>Balance</i>
11-13	Check 00000340415687		-545.33	148,632.26
11-13	Check 00000340415684		-541.97	148,090.29
11-13	Check 00000340415682		-490.06	147,600.23
11-13	Check 00000340415688		-445.33	147,154.90
11-13	Check 00000340415683		-395.33	146,759.57
11-13	Check 00000340415680		-389.04	146,370.53
11-13	Check 00000340415681		-345.33	146,025.20
11-13	Check 00000340415695		-247.64	145,777.56
11-13	Check 00000340415691		-207.64	145,569.92
11-13	Check 00000340415689		-13.14	145,556.78
11-13	Check 00000310251170		-639.30	144,917.48
11-13	Check 00000310251220		-347.64	144,569.84
11-13	Check 00000310251456		-185.14	144,384.70
11-13	Check 00000310251466		-152.41	144,232.29
11-13	Check 00000310251698		-89.03	144,143.26
11-14	SC Check 8721 00000310466518		-6,600.00	137,543.26
11-14	Check 8725 00000310465380		-5,280.00	132,263.26
11-14	Check 00000310449657		-545.33	131,717.93
11-14	Check 00000310449699		-432.45	131,285.48
11-15	#Deposit 00000350251418	19,896.21		151,181.69
11-16	#Deposit 00000350272978	12,481.28		163,662.97
11-16	Check 8724 00000310676693		-4,540.00	159,122.97
11-16	Check 8723 00000310676694		-3,261.06	155,861.91

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1307 S PULASKI RD  
CHICAGO IL 60623-1236Direct inquiries to:  
24 Hour Access 866 Parknatl  
OR WWW.PARKNATL.COMPark National Bank  
11 West Madison  
Oak Park, IL 60302

<i>Date</i>	<i>Description</i>	<i>Additions</i>	<i>Subtractions</i>	<i>Balance</i>
11-16	#Preauthorized Debit FIA ONLINE PYMT ONLINE PMT 071116 CKF035434996POS 67010906557099		-3,182.56	152,679.35
11-19	#Deposit 00000350304469	11,281.31		163,960.66
11-19	Check 8726 00000310054343		-12,043.20	151,917.46
11-19	Check 00000320633315		-547.64	151,369.82
11-20	#Deposit 00000350336104	12,474.31		163,844.13
11-20	SC Check 8727 00000310221664		-8,864.84	154,979.29
11-21	#Deposit 00000330452478	14,767.27		169,746.56
11-21	#Preauthorized Debit CERTIFIED GROC STR STATEM 071121 21000027150193		-6,627.20	163,119.36
11-23	#Deposit 00000340448932	14,103.01		177,222.37
11-23	Check 8732 00000310450146		-2,288.00	174,934.37
11-23	Check 00000320228965		-545.33	174,389.04
11-26	Check 00000320336546		-639.30	173,749.74
11-26	Check 00000320336772		-543.02	173,206.72
11-26	Check 00000320336749		-448.84	172,757.88
11-26	Check 00000320336773		-297.64	172,460.24
11-26	Check 00000320336521		-158.14	172,302.10
11-27	#Deposit 00000350385924	8,236.75		180,538.85
11-27	#Return Deposit Item 129001127145848		-364.25	180,174.60
11-27	#Service Charge RETURN DEPOSIT ITE 129001127145848		-7.00	180,167.60
11-27	#Return Deposit Item 129001127145848		-262.50	179,905.10
11-27	#Service Charge RETURN DEPOSIT ITE 129001127145848		-7.00	179,898.10





PARK NATIONAL

November 30, 2007  
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1307 S PULASKI RD  
CHICAGO IL 60623-1236Direct inquiries to:  
24 Hour Access 866 Parknatl  
OR WWW.PARKNATL.COMPark National Bank  
11 West Madison  
Oak Park, IL 60302

<i>Date</i>	<i>Description</i>	<i>Additions</i>	<i>Subtractions</i>	<i>Balance</i>
11-27	Check 00000350385937		-442.62	179,455.48
11-27	Check 00000350385926		-339.27	179,116.21
11-27	Check 00000350385929		-244.28	178,871.93
11-27	Check 00000350385925		-180.63	178,691.30
11-27	Check 00000350385939		-144.28	178,547.02
11-27	Check 00000350385949		-24.28	178,522.74
11-27	SC Check 8733 00000310744229		-12,233.10	166,289.64
11-27	SC Check 8730 00000310744065		-7,223.90	159,065.74
11-27	Check 8729 00000310725451		-2,966.00	156,099.74
11-28	#Deposit 00000350408296	13,515.34		169,615.08
11-28	Check 8728 00000310048731		-15,595.40	154,019.68
11-28	Check 8731 00000310041390		-13,636.34	140,383.34
11-28	Check 00000320543703		-547.64	139,835.70
11-28	Check 00000320544176		-329.56	139,506.14
11-29	#Return Deposit Item 129001129151957		-422.00	139,084.14
11-29	#Service Charge RETURN DEPOSIT ITE 129001129151957		-7.00	139,077.14
11-29	Debit Memo 00000310159996		-139,506.14	-429.00
11-29 R	Check 8734 00000310145155		-14,979.00	-15,408.00
11-29	#Return Item CHECK 8734 00000310145155	14,979.00		-429.00
11-30	#Overdraft/NSF Fee FOR OVERDRAFT DEBIT MEMO 000000310159996 226001130072553		-25.00	-454.00
11-30	#Return Deposit Item 127001130144212		-147.45	-601.45
11-30	#Service Charge RETURN DEPOSIT ITE 127001130144212		-7.00	-608.45



SUPREME JUICE CO  
1307 S PULASKI RD  
CHICAGO IL 60623-1236

Direct inquiries to:  
24 Hour Access 866 Parknatl  
OR WWW.PARKNATL.COM

Park National Bank  
11 West Madison  
Oak Park, IL 60302

Date	Description	Additions	Subtractions	Balance
11-30	Check 8735 00000320724212		-495.00	-1,103.45
11-30	Ending totals	246,957.45	- 363,682.38	\$-1,103.45

R-Check has been returned  
SC-Substitute Check

Number	Date	Amount	Control
0	11-13	547.64	00000340415690
0	11-13	545.33	00000340415685
0	11-13	545.33	00000340415686
0	11-13	545.33	00000340415687
0	11-13	541.97	00000340415684
0	11-13	490.06	00000340415682
0	11-13	445.33	00000340415688
0	11-13	395.33	00000340415683
0	11-13	389.04	00000340415680
0	11-13	345.33	00000340415681
0	11-13	247.64	00000340415695
0	11-13	207.64	00000340415691
0	11-13	13.14	00000340415689
0	11-13	639.30	00000310251170
0	11-13	347.64	00000310251220
0	11-13	185.14	00000310251456
0	11-13	152.41	00000310251466
0	11-13	89.03	00000310251698
0	11-14	545.33	00000310449657
0	11-14	432.45	00000310449699
0	11-19	547.64	00000320633315
0	11-23	545.33	00000320228965
0	11-26	639.30	00000320336546
0	11-26	543.02	00000320336772
0	11-26	448.84	00000320336749
0	11-26	297.64	00000320336773
0	11-26	158.14	00000320336521
0	11-27	442.62	00000350385937
0	11-27	339.27	00000350385926
0	11-27	244.28	00000350385929
0	11-27	180.63	00000350385925
0	11-27	144.28	00000350385939
0	11-27	24.28	00000350385949
0	11-28	547.64	00000320543703
0	11-28	329.56	00000320544176
8714	11-02	36,942.96	00000310235707
8715	11-05	590.51	00000310409302
8716	11-01	3,666.19	00000310144119
8717sc	11-05	730.97	00000310412636
8718	11-05	443.67	00000310411355



**PARK NATIONAL**November 30, 2007  
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1307 S PULASKI RD  
CHICAGO IL 60623-1236Direct inquiries to:  
24 Hour Access 866 Parknatl  
OR WWW.PARKNATL.COMPark National Bank  
11 West Madison  
Oak Park, IL 60302

8719	11-08	11,756.93	00000310046891
8720	11-09	28,090.62	00000310152742
8721sc	11-14	6,600.00	00000310466518
8723*	11-16	3,261.06	00000310676694
8724	11-16	4,540.00	00000310676693
8725	11-14	5,280.00	00000310465380
8726	11-19	12,043.20	00000310054343
8727sc	11-20	8,864.84	00000310221664
8728	11-28	15,595.40	00000310048731
8729	11-27	2,966.00	00000310725451
8730sc	11-27	7,223.90	00000310744065
8731	11-28	13,636.34	00000310041390
8732	11-23	2,288.00	00000310450146
8733sc	11-27	12,233.10	00000310744229
8734R	11-29	14,979.00	00000310145155
8735	11-30	495.00	00000320724212

\* Skip in check sequence

R-Check has been returned

SC-Substitute Check



November 30, 2007  
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---- BALANCING SECTION ----

**Complete your statement balancing with the following steps:**

1. List and total the amount of all deposits entered in your checkbook that are not shown on this statement in the space provided for "DEPOSITS".
2. Compare and check off each paid check against your checkbook record. List and total all checks you have not checked off in the space provided for "CHECKS OUTSTANDING."
3. Perform the indicated steps in the balancing section.

**If your checkbook and bank statement do not balance:**

- \* Review last month's statement to make sure any differences were corrected.
- \* Check for any automatic transfers, payments, etc. on this Statement.
- \* Check additions and subtractions in your checkbook.
- \* Compare the amount of each check and deposit with the amount recorded in your checkbook and on this statement.
- \* Make sure all outstanding checks have been recorded under "CHECKS OUTSTANDING".
- \* Make sure that each paid check you receive with your statement has been recorded in your checkbook.

**Bring your checkbook up-to-date with the following steps:**

1. **SUBTRACT** from your checkbook balance any monthly service charge and any other charges not previously deducted.
2. **ADD** to your checkbook balance EACH Deposit or Automatic Deposit that is not recorded.

DEPOSITS Not Yet Credited By Bank		
CHARGES By Bank Not Yet Deducted From Checkbook		
Balance Per Statement		
TOTAL		

CHECK NUMBER	CHECKS OUTSTANDING
Total Checks	
Balance Per Checkbook	
TOTAL	

TOTALS SHOULD AGREE

## ABOUT YOUR STATEMENT

**ABOUT YOUR STATEMENT**  
All transactions posted to your account are subject to verification.

**FOR CONSUMER ACCOUNTS ONLY**

## IN CASE OF ERRORS OR QUESTIONS ABOUT YOUR ELECTRONIC TRANSFERS

Telephone us at 866-727-5628 or write us at Park National Bank, 1000 E. 111th St. Chicago, IL 60628 as soon as you can, if you think your statement or receipt is wrong or if you need more information about a transfer on the statement or receipt. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.

- (1) Tell us your name and account number (if any).
- (2) Describe the error or the transfer you are unsure about, and explain as clearly as you can why you believe there is an error or why you need more information.
- (3) Tell us the dollar amount of the suspected error.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days (or 20 business days for new accounts) to do this, we will credit your account for the amount you think is in error so that you will have the use of the money during the time it takes us to complete our investigation. To qualify for this credit we may require a written notice of the problem or complaint within 10 business days if the notification was made by telephone.

**CLAIMANT SUPREME JUICE CO.'S REQUEST TO IMMEDIATE RELEASE OF CLAIMED PROPERTY PURSUANT TO 18 U.S.C. 983(f)(1) ET SEQ.**

Claimant Supreme Juice Co. (Claimant), pursuant to 18 U.S.C. 983(f)(1) *et seq.*, requests the immediate return of that property, identified in its claim form (hereto attached), and, in support of this request, says as follows:

(1) The claimant has a possessory interest in the property;

**Explanation:** The subject property, which consists of funds in the Claimant's bank account (*see claim form attached*) was owned by the Claimant.

(2) The Claimant has sufficient ties to the community to provide assurance that the property will be available at the time of the trial;

**Explanation:** Claimant's owner owns a home with street address 8759 South California, Evergreen Park, IL 60805; has owned that home; and has resided therein continuously since 1977. The spouse of Claimant's owner (they have been married since 1989) also resides at the foregoing address. Claimant has done business in the community since January 1, 1990 (when Claimant's operation under its present owner commenced). The children of Claimant's owner are 15 years old and 13 years old and reside with the claimant's owner.

(3) The continued possession by the Government pending the final disposition of forfeiture proceedings will cause substantial hardship to the claimant, such as preventing the functioning of a business, preventing an individual from working, or leaving an individual homeless;

**Explanation:** The seized property constitutes the entire operating capital of the Claimant. Claimant is accordingly unable to operate its business in any meaningful sense. Claimant, since the seizure has laid off two employees.

(4) The Claimant's likely hardship from the continued possession by the Government of the seized property outweighs the risk that the property will be destroyed, damaged, lost, concealed, or transferred if it is returned to the Claimant during the pendency of the proceeding;

**Explanation:** If Claimant goes out of business, that risk will outweigh any potential disappearance or impairment of the funds in question.

(5) None of following the conditions apply:

(a) The property is contraband, currency, or other monetary instrument, or electronic funds unless such currency or other monetary instrument or electronic funds constitutes the assets of a legitimate business which has been seized;

**Explanation:** The subject currency constitutes assets of a legitimate business.

(b) The property is to be used as evidence of a violation of the law;

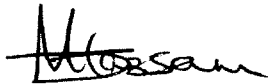
**Explanation:** The subject funds are unrelated to the alleged criminal violation in question—a currency reporting violation. The only relevant evidence of the subject reporting violation is the bank records which reflect dates and amounts of deposits.

(c) The property, by reason of design or other characteristic, is particularly suited for use in illegal activities;

**Explanation:** The alleged criminal violation in question involves currency-reporting requirements. The dollars in question, in and of themselves, have no connection to future reporting requirements or any other illegal activity.

(d) The property is likely to be used to commit additional criminal acts if returned to the claimant.

**Explanation:** The alleged criminal violation in question involves currency-reporting requirements. The dollars in question, in and of themselves, have no connection to the commission of additional crimes.



Shabir Kassam as an officer and  
Director of Supreme Juice Co.

1/8/2008

Date

**SEIZED ASSET CLAIM FORM**

Name: Supreme Juice Co.

Address: 1307 South Pulaski, Chicago IL 60623

Telephone Number: 773-277-5800

Date of Seizure: On or about 11/28/07

Seizure Location: Park National Bank, 11 W. Madison St., Oak Park, Illinois 60302.

**PART I**

List all the items in which you claim an interest. Include sufficient information to identify the items, such as serial numbers, make and model numbers, tail numbers, photographs, and so forth. Attach additional sheets of paper if more space is needed.

**Funds in claimant's bank account, number 1865593, held at Park National Bank (address above). Totaling \$139,506.14.**

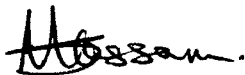
**PART II**

State your interest in each item of property listed above. Provide any documents that support your claim of interest, such as titles, registrations, bills of sale, receipts, and so forth. Attach additional sheets of paper if more space is needed.

**Claimant is the owner of the above bank account and the funds therein (recent bank statement hereto attached).**

**PART III (ATTESTATION AND OATH)**

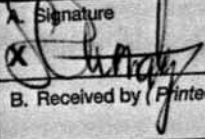
I attest and declare *under penalty of perjury* that my claim to this property is not frivolous and that the information provided in support of my claim is true and correct to the best of my knowledge and belief.



Shabir Kassam as an officer and  
Director of Supreme Juice Co.

1/8/2008

Date

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>		A. Signature 	
		<input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
		B. Received by (Printed Name)	C. Date of Delivery
1. Article Addressed to: Internal Revenue Service Special Agent in Charge Attn: Brenda Viteri, Asset Forfeiture Coordinator 230 South Dearborn St. Suite 400 Chicago, IL 60604		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No JAN 10 2008	
		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
2. Article Number (Transfer from service label)		7003 0500 0002 2502 4950	
PS Form 3811, August 2001		Domestic Return Receipt 102595-02-M-1540	

Re:  
(Supreme Juice)

U.S. Postal Service™  
**CERTIFIED MAIL™ RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)  
For delivery information visit our website at [www.usps.com](http://www.usps.com)

0002 0000 0050 4950

**OFFICIAL USE**

1/8/08

Postmark Here

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Sent To  
IRS - Special Agent in Charge  
Street, Apt. No. Attn: Brenda Viteri, A.F.C.  
or PO Box No. 230 S. Dearborn St. #400  
City, State, ZIP+4 Chicago IL 60604

PS Form 3800, June 2002 See Reverse for Instructions